

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

RE: CARMEN CAMILLE STARKS	)	
AKA CARMCIDA C. STARKS,	)	
	)	Chapter 7
Wilshire Credit Corporation/U.S. Bank	)	
National Association, as Trustee for	)	
the Specialty Underwriting and	)	
Residential Finance Trust Mortgage	)	
Loan Asset-Backed Certificates	)	
Series 2006-BC4,	)	
	)	
Creditor,	)	
vs.	)	CASE NO. 09B30623
	)	JUDGE Pamela S. Hollis
CARMEN CAMILLE STARKS AKA	)	
CARMCIDA C. STARKS,	)	
	)	
Debtor,	)	
	)	

NOTICE OF MOTION

TO: SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE THAT ON September 10, 2009 at 10:00 am, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Pamela S. Hollis, U.S. Bankruptcy Judge, 219 S. Dearborn Street, Chicago, Illinois, room 644, and shall then and there present the attached Motion and at which time you may appear if you so desire.

CERTIFICATION

I, the undersigned Attorney, Certify that I served a copy of this Notice to the Addresses attached by electronic notice through ECF or by depositing the same at the U.S. Mail at 1 North Dearborn, Chicago, Illinois 60602 at 5:00 P.M. on 9/3/09, with proper postage prepaid.

\*\*THIS DOCUMENT IS AN ATTEMPT  
TO COLLECT A DEBT AND ANY  
INFORMATION OBTAINED WILL BE  
USED FOR THAT PURPOSE\*\*

PIERCE & ASSOCIATES, P.C.

/s/ A. Stewart Chapman  
ARDC#6255733

1 North Dearborn  
Suite 1300  
Chicago, Illinois 60602  
312-346-9088

PA09-5350

NOTICE OF MOTION ADDRESSES

To Trustee:  
Richard Fogel  
Shaw, Gussis, et al.  
321 North Clark Street, Suite 800  
Chicago, Illinois 60610  
**By Electronic Notice through ECF**

To Debtor:  
CARMEN CAMILLE STARKS AKA CARMCIDA C. STARKS  
1290 Daisy Drive  
Beaumont, California 92223  
**By U.S. Mail**

7102 South Luella Avenue, #202  
Chicago, IL 60649-2563  
**By U.S. Mail**

To Attorney:  
PRO SE  
SEE ADDRESS FOR DEBTOR(S)  
SEE ADDRESS FOR DEBTOR(S)  
**By Electronic Notice through ECF**

**PIERCE & ASSOCIATES, P.C.**  
**Suite 1300**  
**1 North Dearborn**  
**Chicago, Illinois 60602**  
**(312) 346-9088**

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	)	JUDGE Pamela S. Hollis
CARMEN CAMILLE STARKS AKA	)	
CARMCIDA C. STARKS,	)	
	)	
Debtor,	)	
	)	

**MOTION TO MODIFY THE AUTOMATIC STAY**

NOW COMES Wilshire Credit Corporation/U.S. Bank National Association, as Trustee for the Specialty Underwriting and Residential Finance Trust Mortgage Loan Asset-Backed Certificates Series 2006-BC4, by and through its attorneys, Pierce & Associates, P.C., and requests that the Automatic Stay heretofore entered on the property located at 1290 Daisy Drive, Beaumont, California, be modified, stating as follows:

1. On August 20, 2009, the above captioned Chapter 7 was filed.
2. Wilshire Credit Corporation/U.S. Bank National Association, as Trustee for the Specialty Underwriting and Residential Finance Trust Mortgage Loan Asset-Backed Certificates Series 2006-BC4 services the first mortgage lien on the property located at 1290 Daisy Drive, Beaumont, California.

3. The debt is based on a May 15, 2006, Mortgage and Note in the original sum of \$311,200.00.
4. On August 9, 2009, the owner of the property located at 1290 Daisy Drive, Beaumont, California, Hugo Henry Flores, granted 1% of his interest in the property to the Debtor. This interest was recorded in the County of Riverside Recorder of Deeds on August 31, 2009, after this case was filed.
5. The Debtor has no other interest in this property.
6. The Debtor is not eligible for a Chapter 7 discharge.
7. The funds necessary to pay off Wilshire Credit Corporation/U.S. Bank National Association, as Trustee for the Specialty Underwriting and Residential Finance Trust Mortgage Loan Asset-Backed Certificates Series 2006-BC4 on the above captioned account were approximately \$367,785.76, plus reasonable attorneys fees and costs, through September 2009. According to Zillow.com the market value of said property is \$256,500.00.
8. The account is currently due and owing to Wilshire Credit Corporation/U.S. Bank National Association, as Trustee for the Specialty Underwriting and Residential Finance Trust Mortgage Loan Asset-Backed Certificates Series 2006-BC4 for the March 2008 current mortgage payment and those thereafter, plus reasonable attorneys fees and costs.
9. The Debtor's mailing address is different from 1290 Daisy Drive, Beaumont, California.

10. The debtor has no equity in the property located at 1290 Daisy Drive, Beaumont, California, for the benefit of unsecured creditors.

11. Wilshire Credit Corporation/U.S. Bank National Association, as Trustee for the Specialty Underwriting and Residential Finance Trust Mortgage Loan Asset-Backed Certificates Series 2006-BC4 continues to be injured each day it remains bound by the Automatic Stay.

12. Wilshire Credit Corporation/U.S. Bank National Association, as Trustee for the Specialty Underwriting and Residential Finance Trust Mortgage Loan Asset-Backed Certificates Series 2006-BC4 is not adequately protected.

13. The property located at 1290 Daisy Drive, Beaumont, California is not necessary for the debtor's reorganization.

14. No cause exists to delay the enforcement and implementation of relief and Bankruptcy Rule 4001(a)(3) should be waived.

WHEREFORE, YOUR MOVANT PRAYS that the Automatic Stay be modified and that Bankruptcy Rule 4001(a)(3) be waived as not applicable, plus such other relief as this Court deems just.

Wilshire Credit Corporation/U.S.  
Bank National Association, as  
Trustee for the Specialty  
Underwriting and Residential  
Finance Trust Mortgage

/s/A. Stewart Chapman

A. Stewart Chapman

ARDC#6255733

Pierce and Associates, P.C.

1 North Dearborn St.

Suite 1300

Chicago, Illinois 60602

(312)346-9088